

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1-15 are pending in this application. Claims 14 and 15 are added by the present response. Claims 1, 2, 7, 8, and 13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Applicants' admitted art and U.S. patent 6,618,157 to Coyle et al. (herein "Coyle"). Claims 3-6 and 9-12 were rejected under 35 U.S.C. § 103(a) as unpatentable over Applicants' admitted art and Coyle and U.S. patent 6,370,631 to Dye.

Addressing the above-noted rejections, those rejections are traversed by the present response.

Applicants initially note each of independent claims 1, 7, and 13 is amended by the present response to clarify features recited therein. Specifically, independent claim 1 now clarifies that the image data processing unit includes the graphics port and the peripheral device interconnection port. The other elements are not a part of the image data processing unit. To even further clarify that subject matter, independent claim 1 now recites that the central processing unit is "connected to the image data processing unit", to clarify that the central processing unit is not part of the image data processing unit. Independent claims 7 and 13 are amended to similarly clarify that the central processing unit is "connected to the image data processing unit", and thus is not part of the image data processing unit.

The claim amendments are believed to be clear from the original specification. As shown in Figure 2 as a non-limiting example, the image data processing unit ASIC 108 includes a graphics port and a peripheral device port, but the central processing unit CPU 102 and the first memory MEM-P104 are not part of the image data processing unit ASIC 108.

The features clarified in the claims are believed to more clearly distinguish the claims over the applied art. More particularly, as noted above the claims now clarify that the central

processing unit is not part of the image data processing unit, which is believed to clearly distinguish over the applied art.

As recognized in the Office Action, the admitted art does not disclose that the central processing unit and the first memory are connected on a side of a graphics port with respect to an image data processing unit, nor does the admitted art teach the specifics of the transferring of image data stored in the memory to the image data processing unit.¹ To overcome the above-noted deficiencies in the admitted art the outstanding Office Action cites Coyle, and particularly cites Coyle disclosing an AMCC controller 24 to correspond to the claimed central processing unit.²

In response to the above-noted basis for the rejection, applicants note the AMCC controller 24 in Coyle is part of the image data processing unit in Coyle, which is in contrast to the claims as clarified in the present response.

More particularly, as noted above the central processing unit in the claims is a separate element from the image data processing, and is connected to the image data processing unit. In contrast to that claimed feature, in Coyle the AMCC is located inside the image data processing unit. Thus, Coyle cannot overcome the deficiencies of the admitted art with respect to the above-noted feature.

Moreover, in Coyle image data is output from a RAM to a copier through the AMCC 24, which is also in contrast to the claims. More particularly, in the claims image data is output to a print engine without passing through the CPU, which is in contrast to the teachings in Coyle.

Accordingly, in the structure of Coyle a first memory is not even located on a CPU side with respect to an image data processing unit. As also noted above in Coyle the image

¹ Office Action of September 23, 2004, page 3, prenumbered paragraph 6.

² Office Action of September 23, 2004, page 4, line 8 et seq.

data is output to the copier through the CPU. Such a structure in Coyle differs from the claims as currently written.

In such ways, applicants respectfully submit no teachings in Coyle can overcome the deficiencies in the admitted art, and thus the claims distinguish over the combination of teachings of the admitted art in view of Coyle.

Moreover, no teachings in Dye are believed to overcome the above-noted deficiencies of the admitted art in view of Coyle. Thus, the further rejections based on Dye are not believed to meet the limitations of the amended independent claims 1, 7, and 13, and any of the claims dependent therefrom.

In view of these foregoing comments, applicants respectfully submit each of amended independent claims 1, 7, and 13, and the claims dependent therefrom, patentably distinguish over the applied art.

The present response also sets forth new claims 14 and 15 for examination, of which new claim 14 is independent. Those claims are believed to also distinguish over the applied art.

More particularly, new independent claim 14 recites first and second image data processing units as separate units. As a non-limiting example the first image data processing unit can correspond to the ASIC 108 in Figure 2 and the second image data processing unit can correspond to the CPU 102 in Figure 2. New independent claim 14 is believed to be allowable for similar reasons as discussed above with respect to independent claims 1, 7, and 13 as new independent claim 14 also recites the second image data processing unit as separate from the first image data processing unit. New independent claim 14 also recites the print engine receiving image stored in the first memory without passing through the second image data processing unit. Thus, new independent claim 14, and new claim 15 dependent therefrom, are believed to also distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Gregory J. Maier
Attorney of Record
Registration No. 25,599

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)
SNS:aif

Surinder Sachar
Registration No. 34,423

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